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Dear Planning Policy

Re: Consultation on the Publication Draft of the Kingston Local Plan (Regulation 19)

Thank you for consulting Epsom & Ewell Borough Council (EEBC) on the above document. The Council has focused its response on the policies of the Plan that will and/or are likely to have cross boundary implications for our Borough's and have been the subject of our ongoing Duty to Co-operate discussions.

Status of EEBC Local Plan

EEBC's Local Plan is currently at an advanced stage of examination, having been submitted in March 2025 for examination, with public hearings being held across August, September and October 2025 and a further additional public hearing on 2 July 2026.

The next stage will be the statutory consultation on the Inspectors proposed main modifications which are anticipated to take place in Autumn 2026.

EEBC & The Royal Borough of Kingston Upon Thames (RBK) have engaged constructively throughout their respective Local Plan processes reflected through Statements of Common Ground, the most recent being agreed in August 2026.

RBK Publication Draft of the Local Plan

Housing

The Publication Draft of the Local Plan seeks to deliver at least 19,000 homes across the plan period (2025/26 to 2042/43). Growth is to be prioritised on brownfield land within urban areas and other highly accessible locations, followed by sustainable Grey Belt land and specific underutilised brownfield sites within Metropolitan Open Land. EEBC understands through previous RBK consultations and discussions via the Duty to Co-operate that RBK faces significant challenges in terms of its housing land supply.

The plan contains some allocations for the development of non-brownfield land, and it is stated in paragraph 6.4 that the housing requirement is ‘capacity led’. We note that RBK has acknowledged the publication of the Draft London Plan on 16 July 2026 and have stated that they are reviewing this document in detail to fully understand the implications for the borough and Local Plan.

EEBC faces similar challenges in terms of its housing land supply and, as per previous communications with RBK, cannot assist with meeting housing needs arising from outside of the borough. EEBC is therefore supportive of a ‘capacity led’ approach to identifying the housing requirement.

It is noted that RBK intend the delivery of homes to be through a ‘stepped housing trajectory’ to align with the phased availability of land and infrastructure. The peak of delivery is anticipated to be in years 6 to 10 of the plan period. EEBC considers a stepped trajectory to be an appropriate approach to ensure housing and infrastructure delivery align.

Employment
Thorough its Duty to Co-operate discussions, EEBC is aware of the need for additional employment land within RBK. The policy approach set out in the Economy and Town Centres chapter supports the provision of new employment premises and directs such uses towards the designated employment locations, while protecting existing employment uses. EEBC acknowledges the challenge RBK faces in terms of competing land uses with limited site availability and broadly supports the approach taken.

Gypsy and Traveller Accommodation
RBK has identified a need for at least 52 additional Gypsy and Traveller pitches over the ten-year period from 2022/23 to 2031/32. The challenge in meeting this need is recognised by EEBC. To address this need, a number of the larger allocations within the plan require an element of permanent traveller pitch provision, while policy KH8 requires the provision of approximately 0.2ha of permanent traveller pitch provision on sites exceeding 2 hectares and is supportive of the expansion of existing sites subject to a number of criteria being satisfied. EEBC is broadly supportive of this approach, although the number of pitches to be delivered through the allocations is unclear.

Infrastructure
EEBC is supportive of RBK’s approach in ensuring that development is supported by appropriate infrastructure.

To conclude, EEBC do not have any soundness concerns in relation to the Publication Draft of the Kingston Local Plan and welcome the opportunity to continue engaging constructively as the Local Plan Progresses.

Yours sincerely

I Mawer

Ian Mawer
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